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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**

11 TODD R.G. HILL,

12  
13 Plaintiff,

14 vs.  
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16 THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
17 INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW ET AL.,  
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19 Defendants.  
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**Case No. 2:23-cv-01298-JLS-BFM**

**DECLARATION OF DEFENDANT  
IRA SPIRO AUTHENTICATING  
EXHIBITS**

**Motion Before:  
Hon. Magistrate Judge  
Brianna Fuller Mircheff**

Case Assigned to:  
Hon. Josephine L. Staton and  
Hon. Magistrate Judge  
Brianna Fuller Mircheff

**DECLARATION OF DEFENDANT IRA SPIRO****AUTHENTICATING EXHIBITS**

Below is information authenticating the exhibits filed by Defendant Spiro in various documents he filed in support of his motion to dismiss Plaintiff's Fourth Amended Complaint.

1. Exhibit 1 (ECF 263, pp. 17-20): This exhibit is a series of emails. As shown in each of the emails, I either received the email or sent it. Thus, to make the exhibit I obtained the emails from the stored emails in my electronic email system and copied them into the exhibit.

2. Exhibit 2 (ECF 263, pp. 22-23): This exhibit is two emails. As shown in each of them, I sent both of them. Thus, to make the exhibit, I obtained the emails from the stored emails in my electronic email system and copied them into the exhibit.

3. Exhibit 3 (ECF 263, pp. 25-26): This exhibit is two pages from the State Bar's Periodic Inspection Report of the 2020 inspection of Peoples College of Law. In a letter of July 8, 2020 from Natalie Leonard of the State Bar, she included this inspection report. I downloaded the report into my computer. To make this exhibit, because the information in the report that was pertinent to the point I was making in ECF 263 was in page 2 only, I removed the pages of the report other than page 2 and the cover page.

4. Exhibit 4 (ECF 263, pp. 28-31): This exhibit is an announcement of the opening of the position of dean of Peoples College of Law, Dated July 29, 2022. By then my position with PCL was volunteer attorney. A draft of the announcement was emailed to me, I made some suggested edits to it. Exhibit 3 is the final version. It was sent to me, and it is stored in my computer. To make this exhibit, I simply made the final version I had into a pdf and attached that pdf as the exhibit to ECF 263.

1           5.       Exhibit 5 (ECF 263, pp. 33-34): This exhibit is two pages from PCL's  
2 2020 tax return. Around the time the tax return was written, it was emailed to me,  
3 and I downloaded it into my computer. To make this exhibit, I included only the two  
4 pertinent pages, removing the others, and attached the result as the exhibit to ECF  
5 263. For purposes of the right of privacy and the tax return privilege, I also removed  
6 information in the return that was not pertinent to the point I was making in ECF  
7 263.

8           6.       Exhibit 6 (ECF 263, pp. 33-34): This exhibit is a PCL profit and loss  
9 statement for the period September 2018 to August 2019. From time to time profit  
10 and loss statements were emailed to me by PCL officials. I saved this one in my  
11 computer. To make this exhibit, I included only the pertinent page, the last page,  
12 removing the others, and attached the result as the exhibit to ECF 263.

13           7.       Exhibit 7 (ECF 263, p. 38): This exhibit is a page from PCL's directors  
14 and officers liability insurance policy for the period January 19, 2023 to January 19,  
15 2024. When yearly renewals of this insurance come up, because the insurance  
16 covers me, I get in touch with the insurance company representative to obtain the  
17 policy, and I download the policies into my computer. To make this exhibit, I made  
18 included only the pertinent page, what's often called the declarations page,  
19 removing the others, and attached the result as the exhibit to ECF 263.

20           8.       Exhibit 8 (ECF 263, pp. 40-46): This exhibit is a series of emails  
21 between Plaintiff and me. As shown in each of the emails, I either received the  
22 email or sent it. Thus, to make the exhibit I obtained the emails from the stored  
23 emails in my electronic email system and copied them into the exhibit.

24           9.       Exhibit 101 (ECF 278, pp. 25-28): This exhibit is the minutes of the  
25 5/22/17 meeting of the board of directors of PCL. The minutes of most board  
26 meetings were sent to all board members. I was a member then. I saved the minutes  
27 in my computer. To make the exhibit I simply added the minutes to the exhibits to  
28 ECF 278.

1           10.     Exhibit 102 (ECF 278, p. 30): This exhibit is the first page of the  
2 minutes of the 9/28/17 meeting of the board of directors of PCL. The minutes of  
3 most board meetings were sent to all board members. I was a member then. I saved  
4 the minutes in my computer. To make the exhibit I simply added the minutes to the  
5 exhibits to ECF 278, but I included only the first page because it was the only page  
6 pertinent to the point I was making here.

7           11.     Exhibit 103 (ECF 278, p. 32): This exhibit is the first page of the  
8 minutes of the 12/5/17 meeting of the board of directors of PCL. The minutes of  
9 most board meetings were sent to all board members. I was a member then. I saved  
10 the minutes in my computer. To make the exhibit I simply added the minutes to the  
11 exhibits to ECF 278, but I included only the first page because it was the only page  
12 pertinent to the point I was making here.

13          12.     Exhibit 104 (ECF 278, p. 34): This exhibit is the first page of the  
14 minutes of the 3/19/18 meeting of the board of directors of PCL. The minutes of  
15 most board meetings were sent to all board members. I was a member then. I saved  
16 the minutes in my computer. To make the exhibit I simply added the minutes to the  
17 exhibits to ECF 278, but I included only the first page because it was the only page  
18 pertinent to the point I was making here.

19          13.     Exhibit 105 (ECF 278, p. 36): This exhibit is the first page of the  
20 minutes of the 9/19/19 meeting of the board of directors of PCL. The minutes of  
21 most board meetings were sent to all board members. I was a member then. I saved  
22 the minutes in my computer. To make the exhibit I simply added the minutes to the  
23 exhibits to ECF 278, but I included only the first page because it was the only page  
24 pertinent to the point I was making here.

25          14.     Exhibit 106 (ECF 278, p. 38): This exhibit is the first page of the  
26 minutes of the 3/15/20 meeting of the board of directors of PCL. The minutes of  
27 most board meetings were sent to all board members. I was a member then. I saved  
28 the minutes in my computer. To make the exhibit I simply added the minutes to the

1 exhibits to ECF 278, but I included only the first page because it was the only page  
2 pertinent to the point I was making here.

3 15. Exhibit 107 (ECF 278, p. 40): This exhibit is the first page of the  
4 minutes of the 5/17/20 meeting of the board of directors of PCL. The minutes of  
5 most board meetings were sent to all board members. I was a member then. I saved  
6 the minutes in my computer. To make the exhibit I simply added the minutes to the  
7 exhibits to ECF 278, but I included only the first page because it was the only page  
8 pertinent to the point I was making here.

9 16. Exhibit 108 (ECF 278, p. 42): This exhibit is the first page of the  
10 minutes of the 8/24/20 meeting of the board of directors of PCL. The minutes of  
11 most board meetings were sent to all board members. I was a member then. I saved  
12 the minutes in my computer. To make the exhibit I simply added the minutes to the  
13 exhibits to ECF 278, but I included only the first page because it was the only page  
14 pertinent to the point I was making here.

15 17. Exhibit 109 (ECF 278, p. 44): This exhibit is an email I sent on July 14,  
16 2021, announcing my resignation as dean effective August 13, 2021. It was sent  
17 through Populi, so I received a copy of it. I kept it in my electronic email system. To  
18 make the exhibit I simply made a pdf of it and attached the pdf as an exhibit to ECF  
19 278. This was the second announcement of my resignation. I had made an  
20 announcement of my resignation in January, 2021 to take effect several months  
21 later, but I postponed my resignation as shown in Exhibit 110.

22 18. Exhibit 110 (ECF 278, p. 46): This exhibit is a letter I emailed to the  
23 Committee of Bar Examiners of the State Bar. I kept the letter in my computer. To  
24 make the exhibit I simply attached it as an exhibit to ECF 278, but in included only  
25 the first page because it was the only page pertinent to the point I was making here.

26 19. Exhibit 111 (ECF 278, p. 48): This exhibit is an email I received from  
27 Plaintiff, dated January 9, 2021, shortly after I sent to Plaintiff and many others at  
28

1 PCL my January 2021 announcement of my resignation. To make the exhibit I  
2 simply made it into a pdf and attached it to ECF 278.

3 20. Exhibit 112 (ECF 283, pp. 4-6): This exhibit is three pages from the  
4 transcript of the hearing/trial in the proceedings on Plaintiff's petition for a civil  
5 harassment restraining order. As I recall, I received the transcript from the reporter  
6 by email and stored it in my computer. To make the exhibit I simply attached it to  
7 ECF 283, but I attached only the pages that are pertinent to the point I was making  
8 here, plus the reporter's certificate.

9 21. Exhibit 201 (ECF 283, pp. 8-19): This exhibit is the standard Student  
10 Tuition, Enrollment & Registration Agreement in use at PCL for students enrolling  
11 in the 2019-2020 academic year. This one is signed by Plaintiff. I was dean at the  
12 time. As I recall, when I was dean then I kept copies of the tuition of all students  
13 who enrolled for that academic year. When Plaintiff brought his first lawsuit against  
14 PCL in 2022, I decided to keep all documents I had pertaining to him. I made this  
15 agreement into a pdf and attached it as Exhibit 202 to ECF 283

16 22. Exhibit 202 (ECF 283, pp. 21-22): This exhibit is the agreement signed  
17 by Plaintiff to pay his tuition in installments. The yearly tuition was \$5000, and at  
18 the time of this Agreement, Plaintiff' overdue tuition was either \$1866 or \$3722.  
19 This agreement provided for him to pay his overdue tuition and tuition for the rest of  
20 the academic year in monthly installments. I was dean. I wrote the agreement. I saw  
21 to it that Plaintiff signed it and I kept a copy of it, turned it into a pdf, and loaded it  
22 into my computer. To make this exhibit I simply added the pdf as Exhibit 202 to  
23 ECF 283.

24 23. Exhibit 203 (ECF 283, pp. 24-25): This exhibit is a record of Plaintiff's  
25 payments of tuition in PCL's electronic record-keeping system, called Populi.  
26 Plaintiff filed this document himself as an Exhibit to his himself. (Exhibit 203  
27 below, filed by Plaintiff as an exhibit to his ECF 21.

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24. Exhibit 204 (ECF 283, pp. 27-28): This exhibit is a letter dated November 29, 2021 from the Registrar/Administrator of PCL to Plaintiff stating that he must pay his \$7934 of overdue tuition by December 31, 2021 or else he would not be allowed to attend classes after that date. This letter was sent to me by the Registrar/Administrator, I believe as a pdf, and to make it an exhibit I simply attached it as an exhibit to ECF 283.

25. Exhibit A (ECF 182, pp. 4-6): This exhibit is an emailed notice of electronic filing I received from the Court's ECF system. I made it into a pdf and attached it as an exhibit to ECF 182.

26. Exhibit A (ECF 182, pp. 4-6): This exhibit is an emailed notice of electronic filing I received from the Court's ECF system. I made it into a pdf and attached it as an exhibit to ECF 182.

27. Exhibit B (ECF 182, p. 8): This exhibit is an email I received from Natalie Hope of the State Bar. I made it into a pdf and attached it as an exhibit to ECF 182.

28. Exhibit AA (ECF 278, pp. 50-51): This exhibit is two pages from PCL's 2017 tax return. Around the time the tax return was written, it was emailed to me, and I downloaded it into my computer. To make this exhibit, I included only the two pertinent pages, removing the others, and attached the result as the exhibit to ECF 278. For purposes of the right of privacy and the tax return privilege, I also removed information in the return that was not pertinent to the point I was making in ECF 278.

Dated: May 4, 2025

\_\_\_\_\_/s/\_\_\_\_\_  
Ira Spiro (sued as Robert Ira Spiro)  
Defendant, a Self-Represented Attorney



**PROOF OF SERVICE****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the date stated below, I served the document described as **DECLARATION OF DEFENDANT IRA SPIRO AUTHENTICATING EXHIBITS** on the interested parties in this action by placing: [ ] the original [xx] true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R.G. Hill  
119 Vine Street  
Belton, TX 76513

[X] **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

[X] **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

[ ] **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

[ ] **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

[ ] **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed April May 4, 2025 at Los Angeles, California.

Ira Spiro  
\_\_\_\_\_  
Type or Print Name

/s/  
\_\_\_\_\_  
Signature